

Anand, on the other hand, discloses:

Primitive Business Indicators are Business Indicators that are directly mappable to data in the data warehouse. They are set up during installation of the present invention and are not changeable by the user.

(column 4, lines 33-37). Anand further discloses:

The process of creating the metadata 25 is illustrated in more detail in FIG. 7.... During installation, some industry-specific metadata 25 is used, some company specific metadata 25 may be created, and the mapping information needed to map metadata 25 to data warehouse 24 is created. All metadata 25, including the mapping information, is stored in a set of relational tables. These relational tables are kept in data warehouse 24 and used by the present invention to create reports for the user.

(Column 11 lines 18-31). Figure 7 of Anand shows that the metadata, mapping information, and relational tables are created the old fashioned way, by a human who inputs this information by hand. Figure 13 shows this point in explicit detail. As disclosed by Anand:

In step 141, the user specifies a business concept.

In step 142, the user specifies one or more attributes for the business concept.

In step 144, client subsystem 12 provides the user with the list of columns in data warehouse 24.

In step 146, the user maps every attribute to a column. The user can provide a textual description of the business concepts and the attributes.

In step 148, the user specifies one or more Business Indicators by “mapping” a Business Indicator to a column in a table in data warehouse 24.

In step 150, client subsystem 12 provides the user with a list of columns for the purpose of mapping Business Indicators as well.

(Column 17 line 60-Column 18 line 6). Clearly, a human being is needed to create the metadata, mapping information, and relational tables of Anand’s system.

Anand, therefore, does not disclose or suggest “automatically generating the business database system according to instructions contained in the metadata schema such that the business database system is well-formed,” as recited in claim 133.

Papierniak fails to cure these basic deficiencies of Anand. Papierniak, in fact, discloses:

The metadata comprises the following information:  
Schema...

Table/file description  
Table relationships

(Column 24 lines 8-28). Papierniak also discloses:

FIG. 21 is an exemplary table indicating the various environmental and business data administered and/or collected by the Data Discoverer process.

(Column 25, lines 8-10).

Papierniak does not disclose or suggest “automatically generating the business database system according to instructions contained in the metadata schema such that the business database system is well-formed,” as recited in claim 133.

Even if Anand and Papierniak were combined, the combination would neither teach nor suggest “automatically generating the business database system according to instructions contained in the metadata schema such that the business database system is well-formed,” as recited in claim 133.

Therefore, the assignee submits that claim 133 is patentable over Anand in view of Papierniak.

Given that claims 134-140 and 157-158 depend from claim 133, the assignee submits that these claims are patentable over Anand in view of Papierniak.

Claim 141 recites “automatically generating the business database system according to instructions contained in the metadata schema such that the business database system is well-formed.” Anand and Papierniak, alone or in combination, neither teach nor suggest “automatically generating the business database system according to instructions contained in the metadata schema such that the business database system is well-formed.” Therefore, the assignee submits that this claim is patentable over Anand in view of Papierniak. Given that claims 142-148 and 159-160 depend from claim 141, the assignee submits that these claims are also patentable over Anand in view of Papierniak.

Claim 149 recites "automatically generating the business database system according to instructions contained in the metadata schema such that the business database system is well-formed." Anand and Papierniak, alone or in combination, neither teach nor suggest "automatically generating the business database system according to instructions contained in the metadata schema such that the business database system is well-formed." Therefore, the assignee submits that this claim is patentable over Anand in view of Papierniak. Given that claims 150-156 and 161-162 depend from claim 149, the assignee submits that these claims are also patentable over Anand in view of Papierniak.


Claim 163 recites "automatically generating the business database system according to instructions contained in the metadata schema." Anand and Papierniak, alone or in combination, neither teach nor suggest "automatically generating the business database system according to instructions contained in the metadata schema." Therefore, the assignee submits that this claim is patentable over Anand in view of Papierniak. Given that claims 164-165 depend from claim 163, the assignee submits that these claims are also patentable over Anand in view of Papierniak.

### CONCLUSION

Reconsideration and allowance of claims 133-165 are respectfully requested. Should the Examiner's next action be other than the allowance of all pending claims, the Examiner is invited to call the Assignee's Attorney at (650) 849-4952.

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Respectfully submitted,

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